

PURPOSE AND NEED

I. INTRODUCTION

“Purpose and need” is a critical element of the transportation planning, project programming, and project development stages because it performs two important functions:

- A. It establishes why the sponsoring agency is proposing an action, while at the same time potentially causing environmental impacts, and
- B. It provides the basis for selecting reasonable and practicable alternatives for consideration and for analyzing those alternatives in depth, and is an important factor in selecting the preferred alternative.

If the project purpose and need is defined to meet the above two functions, Section 404 requirements related to defining the project purpose will be satisfied.

Under the National Environmental Policy Act (NEPA), “purpose” and “need” are closely linked but subtly different. “Need” may be thought of as the problem and “purpose” as an intention to solve the problem. Purpose and need statements should include increasing specificity as one progresses from transportation planning to project programming to project development. However, it is important to guard against premature specificity that could artificially limit the range of alternatives considered.

Expressions of purpose and need must reflect statutory and regulatory requirements, fiscal and environmental resources, and community concerns. The identification of purpose and need (e.g., degree of congestion used as a goal in planning and designing transportation facilities) is an administrative process of high importance at all stages. Both the purpose and need, and the factors contributing to their identification, must be clearly documented in a manner acceptable to the owner/operator. If the purpose and need deviates from the usual and expected practice (i.e., from project performance and/or design criteria), the owner/operator may be called upon in the future to rely on this documentation to defend against tort liability actions.

For example, the degree of congestion that users are called upon to endure must reflect the available fiscal resources and a balancing of the desires of the users with the environmental/socioeconomic impacts of satisfying these desires. Freeways and arterials should normally be planned and designed to accommodate estimated traffic 20 years after completion of construction at a level of service at least equal to “C.” However, a community-based planning

process may select a lower level of service goal in consideration of available fiscal resources and environmental impacts with appropriate documentation.

II. PURPOSE AND NEED FOR THE TRANSPORTATION PLANNING STAGE

The regional transportation planning process, which includes systems, subarea, and corridor planning, should establish transportation goals and objectives for all major transportation investments. The transportation goals and objectives for systems and corridors are analogous to a statement of purpose under NEPA. A regional planning needs statement should clearly document a problem or shortfall in meeting goals and objectives.

Initially, the purpose statement should be a general goal, such as to reduce congestion, improve safety, increase mobility, or reduce pollutant emissions, so as to allow consideration of a range of alternative means to achieve the basic project purpose. The statement of purpose should not be so narrow as to preclude a reasonable range of alternatives from consideration. A narrow initial statement of purpose unnecessarily reduces the decision-makers' flexibility to balance competing requirements.

The need for transportation projects should reflect the regional transportation plan's policies and should be expressed in terms of congestion, safety, or air quality, for example. Need should be quantified, providing a measure of the severity and geographic extent of the problem. For example, need could be expressed as a quantified shortfall in meeting defined regional objectives, such as those for mobility, accident frequency, and air quality.

Documentation should be clearly summarized and referenced within the statement of need. Full documentation (in the form of studies, reports, etc.) should:

- A. Include references in the statement of need.
- B. Follow the project through the entire programming, development, and construction process.
- C. Be readily available upon the request of reviewing agencies (transportation and resource agencies).

Products of the transportation planning process (such as reduction in vehicle-kilometers or vehicle-hours of travel, improvements in travel speeds on the system, reduction in traffic accidents, savings in energy consumption, enhanced economic development potential, increased tax base, improved access to public facilities, etc.) should be presented to support the need for the transportation investment.

This purpose and need will serve as the basis for establishing the range of alternatives (such as alternative modes and technologies) to be considered during the transportation planning process (that may include corridor or subarea studies). These studies will ultimately determine project design concept and scope for the emissions analysis of the regional transportation plan required by EPA conformity regulations.

Even though a need may be easily established, one should also consider the constraints of meeting this need, such as the presence of Section 4(f) protected property (49 U.S.C. § 303), Waters of the U.S./Waters of the State (see definitions), floodplains, endangered species, and historical properties.

The purpose statement should guide the range of alternatives that will be considered to respond to the established need. For example, responding to the need for access to the downtown of a metropolitan area could generate alternatives such as transit and feeder projects. Likewise, the need to improve highway safety may result in alternatives to reroute truck traffic, improve geometrics, or bypass or widen existing facilities.

III. PURPOSE AND NEED FOR THE PROJECT PROGRAMMING STAGE

When a project identified in a Statewide Multimodal Transportation Plan is about to be proposed for funding, an Environmental Review Summary form will be prepared. The goals, objectives, and policies of the Statewide Mutimodal Transportation Plan will provide the foundation for defining the project purpose and need statement. As information is developed and more is learned, the purpose and need statement will be refined. During this refinement process, some project alternatives could possibly drop out (see Appendix E, Alternatives Analysis / Aquatic Resource Avoidance), thereby permitting a more focused analysis of the remaining alternatives. Project alternatives that are remaining at the project scoping stage will include estimated costs of avoiding, minimizing, and compensating environmental impacts to Waters of the U. S./Waters of the State and associated sensitive species in their estimated project costs, to ensure that sufficient project funding is requested. Need must be defined more specifically at this stage to support project programming.

IV. PURPOSE AND NEED FOR THE PROJECT DEVELOPMENT STAGE

The need for a project must be very specific at this point in the process. Information gathered during the transportation planning and project programming stages should ensure that the project need is well defined. It is critical that the process that identified and quantified this specific need be explained clearly and concisely within the joint NEPA/SEPA or SEPA environmental document, with specific references to previous studies. If the

need is modified, sufficient data to document the changed circumstances should be provided.

The purpose and need statement at this stage should provide the framework for considering the avoidance or minimization of environmental impacts, and any enhancement of environmental resources in the project area. Sufficient information should be available at this stage to consider all reasonable alternatives that will satisfy the established need.

V. REFERENCES

40 CFR § 230.10(a) Basic project purpose. (Section 404)

40 CFR § 1502.1 Purpose. (NEPA)

40 CFR § 1502.13 Purpose and Need. (NEPA)

Federal Highway Administration. Guidance Paper: "The Importance of 'Purpose and Need' in Environmental Documents." September 18, 1990.

Federal Highway Administration. Technical Advisory T 6640.8A. October 30, 1987. "Guidance for Preparing and Processing Environmental Documents." Attachment, Section V.D. Pages 13–14.

Yocom, T.G., R.A. Leidy, and C.A. Morris. 1989. "Wetlands Protection Through Impact Avoidance: A Discussion of the 404(b)(1) Alternatives Analysis." *Wetlands*. Vol. 9, No. 2, pages 283–297. (Guidance for preparing alternatives analyses. Focuses on residential, industrial, and commercial projects.)

Intermodal Surface Transportation Efficiency Act of 1991. Pub. L. 102–240—December 18, 1991. Section 3012 Metropolitan Planning (49 U.S.C. app. § 1607(f)).

Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. § 303).

EXAMPLES OF FACTORS TO CONSIDER IN DEVELOPING PURPOSE AND NEED

I. TRANSPORTATION PLANNING STAGE

A. Purpose

1. Ensure “purpose” is consistent with transportation goals and objectives (e.g., mobility, safety, capacity, and congestion relief).
2. Ensure “purpose” constitutes a reasonable expenditure of public funds (benefit: cost).
3. Ensure “purpose” is broad enough to allow consideration of a full range of alternative ways to meet the defined need.

B. Need

1. Social Demands or Economic Development

- a. Discuss existing land use plans.
- b. Identify projected land use plan changes.
- c. Identify growth management/control ordinances.

2. Modal Interrelationships

Discuss project interface with airport, rail, port, and mass transit facilities.

3. Capacity, Transportation Demand, and Safety

- a. Describe existing capacity and level of service.
- b. List regional population/traffic forecasts.
- c. Identify projected capacity needs and level of service.
- d. Identify system safety needs.

4. Air Quality Improvements

- a. Identify transportation control measures (e.g., high occupancy vehicle lanes, ramp metering, bike lanes, park-and-ride facilities).
- b. Identify transportation demand management (e.g., rideshare programs, mass transit subsidies).

II. PROJECT PROSPECTUS AND BUDGETING STAGE

- A. Any project purpose and need information developed during the transportation planning stage should be carried forward, updated, and refined in the purpose and need discussion for the project scoping and budgeting stage (i.e., social demands or economic development, modal interrelationships, capacity and transportation demand, air quality improvements).
- B. The following additional information should be provided:
 - 1. Project Status
 - a. Describe the history of the project (adopted corridors, land use plans, regional transportation plans).
 - b. Describe the involvement of other agencies, including any previous planning, programming, or project concurrences/nonconcurrences.
 - c. Identify the actions pending (e.g., NEPA/SEPA or SEPA documentation, final design, right-of-way acquisition, and permits or required approvals).
 - d. Provide the intended project timing.
 - 2. Consistency with Growth Management Act (GMA)
 - a. Describe how the project is consistent with local Comprehensive Plans.
 - b. Describe how the project is consistent with Regional Transportation Plans.
 - c. Describe how the project is consistent with the Statewide Multimodal Transportation Plan.
 - 3. Legislation

Describe any federal, state, or local government mandates (e.g., demonstration projects, sales tax measure projects).
 - 4. Safety (If relevant to project purpose and need)
 - a. Describe the existing accident rate.
 - b. Provide existing accident data.
 - c. Provide the cost benefit analysis of safety improvement program.
 - d. Explain how the project will improve safety.

5. Roadway Deficiencies (If relevant to project purpose and need)
 - a. Describe operational deficiencies (substandard geometrics, inadequate cross-sections).
 - b. Identify structural limitations (load limits).
 - c. Discuss maintenance problems.
 - d. Explain how the project will correct deficiencies.
6. Environmental Retrofit
 - a. Fish passages
 - b. Noise Walls
 - c. Stormwater
7. Environmental Considerations
 - a. Identify whether the project is located in an Air Quality Non-Attainment Area for carbon monoxide, ozone or PM10, and what issues are anticipated.
 - b. Identify any known critical/sensitive areas (e.g., aquifer recharge area, wellhead protection area, sole source aquifer, geologic hazard area, wetlands, fish and wildlife habitat).
 - c. Identify any historic or archaeological resources.
 - d. Identify any flood plains or ways.
 - e. Identify any potential sources and type of hazardous or dangerous waste (e.g., clean-up sites).
 - f. Identify any potential noise impacts.
 - g. Identify any parks, recreation areas, wildlife refuges, or scenic rivers/byways, 4(f) lands.
 - h. Identify any resource lands (e.g., agricultural, forest/timber, and mineral).
 - I. Identify any streams or tidal waters.
 - J. Identify any tribal lands.
 - k. Identify water quality of impacted streams or tidal waters/storm water (e.g., Clean Water Act Section 303 (d) Water Quality Limited Water Bodies, CSOs, increased runoff, treatment for existing or new pavement, NPDES general stormwater permit, and NPDES general permit for gravel pits and asphalt batch plants).
 - l. Provide any anticipated mitigation measures for each type of impact.
 - m. Identify any previous environmental commitments made in the project area (e.g., long-term mitigation monitoring programs and/or deed restrictions ensuring that the properties within a mitigation area do not become a part of future permit applications).

- n. Identify any long-term maintenance commitments proposed for the project (e.g., post-construction activities such as monitoring and replanting of a proposed mitigation site).
- o. Identify any relevant land use plans (GMA comprehensive plan, zoning, etc.).
- p. Identify any other environmental elements as defined in WAC 197-11-440.

III. PROJECT DEVELOPMENT STAGE

All of the project purpose and need information developed during the project scoping and budgeting stage should be carried forward, updated, and refined in the purpose and need discussion for the project development stage (e.g., project status, legislation, social demands or economic development, modal interrelationships, capacity and transportation demand, safety, roadway deficiencies, air quality improvements and environmental considerations).